



## **GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT**

157 Short Street, Bishop, California 93514-3537  
Tel: 760-872-8211 E-mail: tschade@gbuapcd.org

January 28, 2013

Ms. Deborah Jordan  
US EPA Region IX (AIR-1)  
75 Hawthorne Street  
San Francisco, California 94105

### **Re: Discontinuance of SLAMS monitors at Dirty Socks, North Beach, and Mill Site**

Dear Ms. Jordan:

Due to circumstances beyond the control of the Great Basin Unified Air Pollution Control District (District), last month PM<sub>10</sub> monitoring was discontinued at three of the District's key monitoring sites and the monitors were removed. The discontinued sites include Dirty Socks, North Beach, and Mill Site in the Owens Valley PM<sub>10</sub> nonattainment area. These monitoring sites were located on property owned by the City of Los Angeles (City) and leased to the District. As explained in the attached letter, the City terminated the District's leases at these three sites and ordered the District to remove the monitors by December 29, 2012. Because these PM<sub>10</sub> sites are designated as State and Local Air Monitoring Stations (SLAMS) and are used to develop and implement effective air pollution control strategies, the District is working to re-establish monitoring at nearby locations in accordance with 40 CFR 58.14 (c)(6):

A SLAMS monitor not eligible for removal under any of the criteria in paragraphs (c)(1) through (c)(5) of this section may be moved to a nearby location with the same scale of representation if logistical problems beyond the State's control make it impossible to continue operation at its current site.

These SLAMS monitors are not eligible for removal under 40 CFR 58.14 (c)(1) through (c)(5) because they have measured an average of between 4.4 and 19.0 PM<sub>10</sub> exceedances per year since they were installed (see table below). These monitoring sites are important components of the District's Dust ID monitoring network and are integral to the implementation of the PM<sub>10</sub> control strategy in the Owens Valley Planning Area. These sites are also important in the implementation of the Coso Junction PM<sub>10</sub> Maintenance Plan, which has been approved by the US EPA. Ultimately, these sites will be needed to demonstrate that the area has attained the standard.

Therefore, in accordance with 40 CFR 58.14 (c)(6), the following SLAMS sites were discontinued and will be moved as expeditiously as possible to nearby representative locations.

Site Name	AQS Site Number	Start Date	Discontinued	Years in operation	Total Number of PM <sub>10</sub> Violations	Ave. Violations per Year
Mill Site	06-027-0030	May 4, 2011	Dec. 26, 2012	1.6	7	4.4
Dirty Socks	06-027-0022	Jun. 1, 1999	Dec. 19, 2012	13.6	259	19.0
North Beach	06-027-0029	Nov. 25, 2008	Dec. 26, 2012	4.1	44	10.7

The District is in the process of securing the approvals required to re-establish monitoring at nearby locations within the same neighborhood scale distance (<1 km) from the former sites. The District is proposing to relocate the sites onto public land administered by the U.S. Bureau of Land Management (Dirty Socks and Mill Site) and the California State Lands Commission (North Beach). Mainly due to electric power supply (which is provided by the City's Department of Water & Power), the total estimated cost to move these sites and to provide electrical power to the three locations is about \$160,000. We will provide the coordinates for the new sites when we get permission from the land management agencies and have confirmed the location of the power drops.

Please call me or Chris Lanane at (760) 872-8211 if you have any questions regarding this matter.

Sincerely,



Theodore D. Schade  
Air Pollution Control Officer

Attachment

cc: Matthew Lakin, US EPA  
Michael Flagg, US EPA  
Amy Zimpfer, US EPA  
Sylvia Oey, CARB  
Mike Miguel, CARB  
Bernadette Lovato, US BLM  
Colin Connor, CSLC  
Martin Adams, LADWP



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*General Manager*

November 29, 2012

Mr. Theodore D. Schade  
Air Pollution Control Officer  
Great Basin Unified Air Pollution Control District  
157 Short Street  
Bishop, California 93514-3537

Dear Mr. Schade:

Subject: Notice of Partial Termination of License Agreement No. 850 (LA-850)

Pursuant to LA-850, dated November 1, 2008, the Los Angeles Department of Water and Power (LADWP) granted the Great Basin Unified Air Pollution Control District (Great Basin) permission to access various lands owned by the City of Los Angeles (City) in order to construct, operate, and maintain certain air monitoring facilities and equipment. The facilities subject to LA-850 are described in Exhibits A and B of the agreement and include, among others, the following:

1. Air monitoring station (formerly subject to License Agreement No. 769), consisting of a prefabricated 8 x 8-foot cube structure (housing air monitoring equipment); a 33-foot tall meteorological tower adjacent to the cube structure; and a barbed-wire-topped 6-foot chain link fence surrounding the site on City-owned property located on Lot 2 (Inyo County Assessor's Parcel Number 29-260-05), in Section 34, Township 18 South, Range 37 East, Mt. Diablo Meridian, County of Inyo, State of California (Dirty Socks Monitor);
2. Air monitoring station (formerly subject to License Agreement No. 801) consisting of a prefabricated 8 x 8-foot equipment shed to house air monitoring equipment; a 33-foot tall meteorological tower located adjacent to the equipment shed; a 25 x 25 x 6-foot barb-wire-topped chain link fence surrounding the equipment shed; and a 915-MHz upper air radar profiler (RASS) enclosed by a 50 x 50 x 6-foot barb-wire-topped chain link fence, which will be located adjacent to the equipment shed enclosure. The air monitoring station shall be located on City-

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owned property, known as the "Mill Site," situated in the northwest quarter of Section 15, Township 17 South, Range 38 East, Mt. Diablo Meridian, County of Inyo, State of California (Mill Site Monitor); and

3. Air monitoring station located on City-owned property situated in a portion of the north half of the northeast quarter of Section 16, Township 16 South, Range 37 East, Mt. Diablo Meridian, County of Inyo, State of California (North Beach Monitor).

For several years, Great Basin has used the data obtained from these monitors, which are identified in the Network Monitoring Plans submitted annually by Great Basin to the U.S. Environmental Protection Agency (EPA), to run its Dust I.D. Model and erroneously justify the issuance of numerous control orders requiring LADWP to install Best Available Control Measures (BACM) on areas surrounding Owens Lake. LADWP will no longer allow the use of its land to support Great Basin's biased efforts to impose sole responsibility for controlling dust in the Owens Valley on it. Furthermore, as EPA monitoring regulations require the presence of only one air quality monitor within the Owens Valley Planning Area (OVPA), Dirty Socks, Mill Site, and North Beach Monitors are not necessary to ensure compliance with any existing legal or regulatory requirements.

Therefore, pursuant to paragraph 12.1 of LA-850, which provides: "Regardless of the manner or duration of use or occupancy of said licensed area by Licensee, and regardless of the permanent character of any works or structures constructed or installed therein or thereon by Licensee, this License may be terminated at any time without cause for any reason or no reason at all in the option of the Department by giving 30 days' notice of termination," LADWP hereby formally notifies Great Basin of its intent to terminate Great Basin's rights under LA-850 to access, operate, and maintain Dirty Socks, Mill Site, and North Beach Monitors. LA-850 shall remain valid and enforceable as to all other facilities subject to the license, as identified in Exhibits A and B of the agreement.

In accordance with Paragraph 12.2, Great Basin is ordered to peaceably vacate and discontinue use of Dirty Socks, Mill Site, and North Beach Monitor sites and facilities within thirty days from the date of this letter, or December 29, 2012, and to comply with all provisions of Paragraph 12 in connection with its surrender of these sites.

Mr. Theodore D. Schade  
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If you have any questions regarding this notice or LADWP's exercise of its rights under LA-850, please contact me at (213) 367-1014.

Sincerely,

A handwritten signature in black ink, appearing to read "Martin L. Adams". The signature is fluid and cursive, with a long horizontal stroke at the end.

Martin L. Adams  
Director of Water Operations

WTV:jmm

c: Mr. Donald S. McGhie, Senior Real Estate Officer, LADWP